

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

TRAVIS BAIR,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-00769-ELH
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

JOINT MOTION TO MODIFY SCHEDULING ORDER

The parties, by and through their respective undersigned counsel, pursuant to Fed. R. Civ. P. 16(b)(4) and Maryland Local Rule 103.9, respectfully submit this Joint Motion to Modify the Scheduling Order, and in support thereof, state as follows:

1. This Federal Tort Claims Act (“FTCA”) action involves a motor vehicle accident on December 31, 2015 in Cumberland, Maryland involving a vehicle operated by Plaintiff, Travis Bair (“Mr. Bair”), and a vehicle operated by an employee of the United States Postal Service.

2. This matter was STAYED on or about February 3, 2022 due to Plaintiff’s incarceration. Plaintiff has recently been released from the Washington County Detention Center. Counsel for Plaintiff has had limited contact with Plaintiff. Counsel for Plaintiff has been delayed in properly preparing this case due to the Plaintiff’s current situation and has had to reschedule several meetings with Plaintiff. In addition, Plaintiff had previously propounded discovery requests to Defendant but has just send revised discovery in order to comply with the Local Rules of this Court.

3. As a result, the parties seek to modify the deadlines in the Scheduling Order as follows:

	<u>OLD DEADLINE</u>	<u>PROPOSED DEADLINE</u>
Rules 26(e)(2) supplementation of Disclosures and responses:	June 3, 2022	August 4, 2022
Discovery deadline and Submission of status reports:	June 17, 2022	August 17, 2022
Requests for admissions:	June 24, 2022	August 24, 2022
Dispositive motion deadline:	July 25, 2022	September 26, 2022

4. Plaintiff and Defendant are working diligently to complete discovery. No party will be prejudiced by modifying the Scheduling Order as outlined above.

5. In addition, the parties are in the process of setting up mediation with the Honorable Susan K. Gauvey.

WHEREFORE, the parties respectfully request that the Court grant the parties' Joint Motion to Modify the Scheduling Order. A proposed Order is enclosed.

Respectfully submitted,

Erek L. Barron
Acting United States Attorney

_____/s/_____
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/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of June, 2022, a copy of the foregoing Joint Motion and Proposed Order was served on counsel of record via the Court's CM/ECF system.

/s/

Ramani Pillai
Attorney for Plaintiff